

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

BEVERLY KOVARCIK

PLAINTIFF

VS.

CAUSE NO. 4:23-cv-00106-SA-JMV

BAYOU ACADEMY

DEFENDANT

**AMENDED JOINT MOTION TO
SUBMIT EXHIBITS UNDER SEAL**

COMES NOW Plaintiff Beverly Kovarcik and Defendant Shaw Educational Foundation (wrongfully named and improperly served as Bayou Academy who is appearing specially herein to contest the jurisdiction and causes of action asserted against it), by and through counsel of record and pursuant to the Federal Rules of Civil Procedure and L.U. Civ. R. 79, hereby move the Court for an Order placing certain exhibits that the Defendant wishes to attach to its Answer to Plaintiff's Complaint under seal. In support of said Motion, the Parties show unto this Honorable Court the following:

This case involves claims regarding the termination of the Plaintiff from the employment of the Shaw Educational Foundation. In her Compliant, the Plaintiff referenced certain items, specifically a video and a contract, that are indispensably and indisputably related to the claims made in this litigation.

The Parties agree that the Exhibits contain information that will be needed in this case. They also agree that the disclosure of said documentation to the public is not desirable for a litany of reasons. Therefore, the Parties are requesting that the Court, pursuant to L.U. Civ. R. 79, issue an order permitting submission of said documents under seal for the duration of this litigation.

In support of this Motion, the Parties rely upon the Memorandum Brief that is being filed contemporaneously herewith and included herein by reference. Pursuant to L. U. Civ. R. 79(e)(3), the parties have attached a copy of a proposed order to the Court for the court's consideration hereto as exhibit "A."

WHEREFORE, the Parties request that the exhibits referenced in the Defendant's answer be allowed to be submitted under seal for the reasons stated herein and in the Motion in support thereof. The Parties further request any additional relief deemed appropriate and/or necessary.

Respectfully submitted, this the 23rd day of June, 2023.

**SHAW EDUCATIONAL FOUNDATION,
(wrongfully named and improperly served as
Bayou Academy), Defendant**

BY: *s/ C. Paige Herring*
**C. Paige Herring, Esq., One of
Counsel of Record for said Defendant**

BEVERLY KOVARCIK, Plaintiff

/s/ Kelvin Pulley
**Kelvin Pulley, Esq.,
Counsel of Record for said Plaintiff**

OF COUNSEL:

C. Paige Herring (MSB #10682)
McAngus Goudelock and Courie, LLC
Post Office Box 2955
Ridgeland, Mississippi 39158
Telephone: (601) 427-7537
Facsimile: (601) 510-9525
paige.herring@mgclaw.com

Kelvin Pulley (MSB # 104106)
The Pulley Law Firm, LLC
104 Cotton Street
Greenwood, Mississippi 38930
Telephone: (662) 453-6488
Facsimile: (662) 453-6489
pulleylawfirm@gmail.com